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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors

- ☐ Affects PG& E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case No.
19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF LAUREN T.
ATTARD IN SUPPORT OF EX PARTE
APPLICATION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
PURSUANT TO B.L.R. 9013-1(c) FOR
ENTRY OF AN ORDER AUTHORIZING
OVERSIZE BRIEF IN OBJECTION TO
CONFIRMATION OF DEBTORS' AND
SHAREHOLDER PROPONENTS'
JOINT CHAPTER 11 PLAN OF
REORGANIZATION DATED
MARCH 16, 2020**

Lauren T. Attard, under penalty of perjury, declares:

1. I am an attorney at Baker & Hostetler, LLP ("**Baker Hostetler**"), counsel to the
Official Committee of Tort Claimants (hereafter, the "**TCC**") in the above captioned chapter 11

1 cases of PG&E Corporation and Pacific Gas and Electric Company (collectively, the “**Debtors**” or
2 “**PG&E**”).

3 2. I submit this Declaration in support of Ex Parte Application of the Official
4 Committee of Tort Claimants for Entry of an Order Authorizing Oversize Brief in Objection to the
5 Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization dated March 16,
6 2020 (the “**Application**”). The Application is filed concurrently herewith.

7 3. Unless otherwise stated in this Declaration, I have personal knowledge of the facts
8 set forth herein.

9 4. Objections to confirmation of the Debtors’ and Shareholder Proponents’ Plan are
10 due on May 15, 2020 [Dkt. 7182].

11 5. To adequately respond to the numerous issues raised in the Plan, the TCC
12 respectfully submits it is necessary for its Confirmation Brief to exceed the 25-page limit.

13 6. I do not believe that the relief requested herein will prejudice the Debtors, the
14 Shareholder Proponents or interested parties, nor do I believe the relief requested on behalf of the
15 TCC is extraordinary or unreasonable in light of the circumstances.

16 7. The TCC therefore respectfully requests that the Court enter an order allowing the
17 TCC to file a Confirmation Brief that exceeds 25 pages.

18 8. Prior to filing the Application, I contacted Stephen Karotkin, counsel for the
19 Debtors, to inquire whether they would oppose or have no objection to the relief sought therein.
20 Mr. Karotkin stated that he has no objection to this request.

21
22 *Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and*
23 *correct to the best of my knowledge and belief.*

24 Executed on May 15, 2020.

25
26 By: /s/ Lauren T. Attard
27 Lauren T. Attard
28